

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO  
LAS CRUCES DIVISION

**JUAN CARLOS LEON-HERRERA**  
*Plaintiff*

v.

**BAR-S FOODS CO D/B/A SIGMA FOODS  
AND JORGE ZUNIGA ISAIS D/B/A RVJ  
TRANSPORT**  
*Defendant*

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**CIVIL ACTION NO. 2:24-cv-00153**

**JURY TRIAL DEMANDED**

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**PLAINTIFF JUAN CARLOS LEON-HERRERA'S RESPONSES AND/OR  
OBJECTIONS TO DEFENDANT JORGE ZUNIGA ISAIS D/B/A RVJ TRANSPORT'S  
REQUEST FOR ADMISSIONS**

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**TO: DEFENDANT, JORGE ZUNIGA ISAIS D/B/A RVJ TRANSPORT, JONES, SKELTON  
& HOCHIULI, P.L.C., by and through their attorneys of record, Raul P.  
Sedillo and Sky Willard, 8220 San Pedro Drive NE, Suite 420,  
Albuquerque, New Mexico 87113.**

COMES NOW, **JUAN CARLOS LEON-HERRERA**, PLAINTIFF in the above-entitled  
and numbered cause, and pursuant to FEDERAL RULES OF CIVIL PROCEDURE, files his  
Responses to **JORGE ZUNIGA ISAIS D/B/A RVJ TRANSPORT'S REQUEST FOR ADMISSIONS**.

**RESPECTFULLY SUBMITTED,**

**DESOUZA INJURY LAWYERS**  
4047 NACO PERRIN BLVD.  
SAN ANTONIO, TEXAS 78217  
210/ 714-4215 – PHONE  
210/496-0060 – FACSIMILE

**BY: /s/ Jorge L. Alvarez**  
JORGE L. ALVAREZ  
STATE BAR NO.: 24115478  
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**BY: /S/ Jeffery E. Pratt**

JEFFERY E. PRATT

STATE BAR NO.: 24115478

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*ATTORNEYS FOR PLAINTIFF*

**Certificate of Service**

This will certify that a true and correct copy of the above and foregoing instrument was duly served in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on October 22, 2024 upon the following:

**VIA CM/ECF NOTIFICATION SYSTEM AND/OR VIA E-MAIL:**

JONES, SKELTON & HOCHULI, P.L.C.

8220 San Pedro Drive NE, Suite 420

Albuquerque, New Mexico 87199

Telephone: 505-339-3500

Raul P. Sedillo

E-Mail: [rsedillo@jshfirm.com](mailto:rsedillo@jshfirm.com)

Sky Willard

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*ATTORNEY FOR DEFENDANT,*

*JORGE ZUNIGA ISAIS D/B/A*

*RVJ TRANSPORT*

**VIA CM/ECF NOTIFICATION SYSTEM AND/OR VIA E-MAIL:**

HOLLAND & HART, LLP  
110 North Guadalupe, Suite 1  
Santa Fe, New Mexico 87501  
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*ATTORNEY FOR DEFENDANT,  
SYGMA NETWORK, INC.*

**/S/ JORGE L. ALVAREZ**  
JORGE L. ALVAREZ

**PLAINTIFF JUAN CARLOS LEON-HERRERA'S RESPONSES**  
**AND/OR OBJECTIONS TO DEFENDANT JORGE ZUNIGA ISAIS D/B/A**  
**RVJ TRANSPORT'S REQUEST FOR ADMISSIONS**

**REQUEST NO. 1:** Admit that on January 7, 2024, you had a duty to keep a proper lookout and to maintain proper control of your vehicle so as to prevent an accident.

**RESPONSE:** Admit.

**REQUEST NO. 2:** Admit that on January 7, 2024, you had a duty to maintain your lane of travel.

**RESPONSE:** Admit.

**REQUEST NO. 3:** Admit that on January 7, 2024, you were qualified to drive commercial motor vehicles in the United States.

**RESPONSE:** Plaintiff objects to this request as it is vague and ambiguous as it fails to define the terms qualified and commercial motor vehicle. This request also seeks an improper legal conclusion. On that basis, Plaintiff denies this request.

**REQUEST NO. 4:** Admit that on January 7, 2024, you had a duty as an Independent Contractor to comply with the Federal Motor Carrier Safety Regulations.

**RESPONSE:** This request seeks an improper legal conclusion relating to Plaintiff's status as an independent contractor. On that basis, Plaintiff denies this request.

**REQUEST NO. 5:** Admit that you were on your phone at the time of the accident.

**RESPONSE:** Deny.

**REQUEST NO. 6:** Admit that you caused the accident.

**RESPONSE:** Deny.

**REQUEST NO. 7:** Admit that you failed to properly maintain your driver logbooks while working for Jorge Zuniga Isaais d/b/a RVJ Transport.

**RESPONSE:** Deny.